

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KARIM P. NAJJAR et al.,

Plaintiffs,

v.

RIAD SALAMEH et al.,

Defendants.

Case No. 1:24-cv-05043-CPO-EAP

**REPORT ON MEET AND CONFER REGARDING
EYG’S AND DTTL’S RESPONSES TO AMENDED COMPLAINT**

Plaintiffs Karim P. Najjar, Halim Abou-Faycal, Younes Bazzi, Jacques Fontaine, Mounir Jermany, Ibrahim Khreibani, Bechara Rizk, Samar Shami, Joseph Tleiji, Salim Tleiji, and Ramzi Zibaoui (collectively, “Plaintiffs”), Defendant Ernst & Young Global Limited (“EYG”), and Defendant Deloitte Touche Tohmatsu Limited (“DTTL”), pursuant to the Court’s February 11, 2025 Order [Dkt. 44] (the “Order”) on the parties’ Stipulation on Schedule for EYG’s and DTTL’s Responses to First Amended Class Action Complaint [Dkt. 43] (the “Stipulation”), report as follows:

1. EYG and DTTL were first named as Defendants in this action in Plaintiff’s July 23, 2024 First Amended Class Action Complaint [Dkt. 3] (the “Amended Complaint”). Both EYG and DTTL are U.K. entities, and neither was served until January 2025.

2. By the time EYG and DTTL were served, the then-previously served Defendants—BDO USA, P.C., Deloitte LLP, Deloitte & Touche LLP, and Ernst & Young U.S. LLP (the “U.S. Accounting Firm Defendants”)—already had filed their respective motions to dismiss [Dkts. 37, 38, 39], which were being briefed.

3. Recognizing that “any motions to dismiss filed by [EYG and DTTL] likely would raise, at least among others, defenses, arguments, and issues that are similar to those that have been raised in the pending motions to dismiss already filed by [the U.S. Accounting Firm Defendants] such that the resolution of the U.S. Defendants’ Motions likely will affect the claims against [EYG and DTTL]” (Stip. at 1), Plaintiffs, EYG, and DTTL entered into their Stipulation, in which they agreed to stay EYG’s and DTTL’s deadline to respond to the Amended Complaint (*id.* ¶ 2). The parties further agreed to meet and confer following the resolution of the U.S. Accounting Firm Defendants’ motions and then, within one week, to “submit a joint proposed schedule or, in the absence of agreement, separate proposed schedules.”

4. On June 10, 2025, the Court granted the U.S. Accounting Firm Defendants’ motions to dismiss. *See* Opinion [Dkt. 66]; Order [Dkt. 67].

5. Since the Court entered its dismissal order, Plaintiffs, EYG, and DTTL have been meeting and conferring pursuant to the Stipulation. The parties believe that they soon may be able to reach agreement on whether or how this case should proceed as to EYG and DTTL. The parties thus request that the Court allow them to continue meeting and conferring and to report back to the Court within one week, by July 8, 2025.

Respectfully submitted this 1st day of July, 2025

/s/ James E. Cecchi

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